

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS ON
TITLE V DRAFT PERMIT

Title V Permit No. V-97-054
GREEN RIVER STEEL CORPORATION
OWENSBORO, KY.
March 18, 1998
MANESH JAYAGOPAL

The public notice for the draft Title V permit was published on December 26, 1997. As of January 26, 1998, the last day of the public comment period, the only comments received were from Green River Steel (GRS). These comments (see attachment) are addressed in detail in this document, along with additional changes made by the Division to comply with general EPA comments and internal determinations.

Response to Company comments:

1. *GRS has suggested that the visible emissions testing as required in the draft permit is excessive and onerous considering the low probability of violations from the source. The company has requested that the frequency of the Method 9 measurements be reduced.*

The Division agrees that the opacity monitoring requirements listed in the draft permit are more stringent than necessary. To reduce the workload on the source while ensuring that compliance with the standards is still verifiable, the Division will require the following monitoring frequencies:

EP 01 - EAF's:	Weekly qualitative monitoring and semi-annual Method 9.
EP 02 - Traveling grinders:	Monthly qualitative monitoring and semi-annual Method 9.
EP 04 - Acid etch house:	Quarterly qualitative monitoring and semi-annual Method 9.
EP 05 - Degassing boiler:	Semi-annual qualitative monitoring and annual Method 9.
EP 06 - Heat soak billets:	Semi-annual qualitative monitoring and annual Method 9.
EP 10 - Austenitizing furnace:	No requirements.
EP 11 - Tempering furnace:	No requirements.
EP 12 - Austenitizing furnace:	No requirements.
EP 13 - Tempering furnace:	No requirements.

2. *GRS has requested that the steel production limits of 180,000 TPY for Emission Point 01 be removed as Owensboro is no longer a non-attainment area for particulates. In addition the company has asked that the 20 TPH limit for each furnace be changed to 40 TPH for both the furnaces.*

The Division agrees that the annual limit on the two electric arc furnaces, carried over from the previous operating permit issued for this plant, is no longer relevant. Further, the 20 TPY limit on each of the furnaces is amended to a total of 40 TPH for the furnaces.

3. *GRS has suggested that the limit on the transformer output should be calculated on the average MVA calculation per shift.*

This limit on the transformer output was added to the plant to prevent the applicability of Regulation 40 CFR 60, subpart AA (incorporated by reference in Regulation 401 KAR 59:570), Standards of Performance for Steel Plants: Electric Arc Furnaces Constructed After October 21, 1974, and On or Before August 17, 1983, due to a change in the transformer increasing its capacity from 18 MVA to 24 MVA. The original transformer which had a maximum capacity of 18 MVA was replaced by one with a rating of 24 MVA, prior to December 9, 1982, without a permit and the company subsequently took a limit in Permit O-83-36 which limited the output of the transformer to 18 MVA. This was done specifically to prevent the change in transformers from being considered a modification and thereby becoming subject to Regulation 401 KAR 59:570, Standards of Performance for Steel Plants: Electric Arc Furnaces Constructed After October 21, 1974, and On or Before August 17, 1983. However, the company has since submitted evidence clarifying that the transformer upgrade was a rewiring of the existing equipment after a burnout, and the change that increased the capacity was an improved cooling system and not the size or number of turns to either the primary or secondary windings. Therefore, the Division has determined that the change to the furnace cooling capacity does not qualify as a modification and the limit on the transformer capacity may be removed. It should be noted, however, that Regulation 40 CFR 60, subpart AA, Standards of Performance for Steel Plants: Electric Arc Furnaces Constructed After August 17, 1983, specifically includes the transformer as part of the furnace. This means that changes made to the transformer after August 17, 1983, qualify as a modification.

4. *GRS has requested that the static pressure limitation be deleted as it is not applicable to these furnaces.*

The Division concurs that the pressure limit applies only to EAF's with a direct shell evacuation system. This limit has been removed from the permit.

5. *The company has suggested that the fan amperage be calculated as a rolling average per shift.*

As the fan amperage is a substitute measure for the volumetric flow rate through each of the hoods, and as the regulation requires only the accuracy of the flow meters to be within $\pm 10\%$, the Division agrees that a rolling average value of the fan amperage should be sufficient to ensure compliance with the regulatory requirements. However, excessive variations in the fan amperage might indicate that the fan and/or the measurement device is faulty. Therefore, the permit shall include a condition requiring that the company maintain records of the raw data from the fan amperage measurements.

6. *GRS stated that the opacity limit should be 10% since the baghouse has a concentrated discharge and not a dispersed discharge.*

The Division agrees that concentrated discharge baghouses should have a 10% opacity limit and has changed the permit condition to reflect this.

7. *The company has requested that the specific control efficiency requirements in the Control Equipment Operating Condition Requirements sections for Emission points 01, 02, and 05 be removed as there are no specific applicable requirements for these conditions.*

The Division would like to clarify that the efficiencies listed in these three emission points are not permit limits, but that the requirements are that the baghouses be operated as designed. However, in accordance with the Division's current policy on Control Equipment Operating Condition Requirements, and to clarify the intent of the permit condition, this section has been rewritten. The requirements now include a condition that the baghouse be inspected regularly to ensure that it is operating as designed. The control efficiency is now included in the description of the emission points.

8. The company has stated that the 2 G & B Traveling Grinders that were permitted for construction were not constructed as planned.

The two grinders have been removed from the permit. The construction permit issued for these units is no longer valid.

9. *GRS has requested that the steel production limits of 145,000 TPY for Emission Point 02 be removed as Owensboro is no longer a non-attainment area for particulates.*

The Division agrees that the annual limit on the traveling grinder, carried over from the previous operating permit issued for this plant, is no longer relevant. This annual limit has been removed.

10. *GRS has requested that the process descriptions and conditions for Emission Points 05 and 06 be changed to allow for the usage of #2 fuel oil as a backup fuel.*

The Division has noted that #2 fuel oil was in the application for use as a backup fuel. The permit has been changed to accommodate its use.

11. *The company has suggested that the recordkeeping requirements for natural gas usage rates at Emission Points 10, 11, 12, and 13 be modified since only total source natural gas usage rate is presently measured. In addition, the company has requested that the particulate limits for EP 10, and 11 and EP 12 and 13 be combined to be 15 TPY for each set of operations.*

The Division has studied this request and found that emission limits for these emission points is not required. Therefore, these requirements have been removed from the permit and the natural gas usage rate is no longer required to be recorded. Further, since the potentials to emit of the particulate emissions are below the allowables, the limits imposed to preclude PSD have been removed. In addition, on reviewing the emission calculations the Division has determined that since all the particulate emissions from these four points are from the fuel combustion Regulation 401 KAR 59:010, New process operations, does not apply. Therefore, there are no specific requirements for these points.

12. *GRS has commented that the report's should be submitted to the Division's Owensboro Regional Office and not the Florence Regional Office as listed in the permit. In addition, the company has asked for clarification on how results of a monitoring data collected just before the end of a reporting period could be submitted within that reporting period.*

The Division has changed the permit to refer to the correct Regional Office. Further, the Division has modified Condition 5 of the Monitoring, Recordkeeping, and Reporting Section to address the uncertainty in the reporting requirements.

13. *The company has suggested that Condition 6 in Section E, Monitoring, Recordkeeping, and Reporting be modified to read 'promptly' rather than 'as promptly as possible' to be consistent with the requirements listed in Regulation 401 KAR 50:035.*

The Division has agreed to this request and the permit has been modified.

14. *GRS has argued that the requirement in Condition 7 of Section E, Monitoring, Recordkeeping, and Reporting, that the company certify compliance with 'other facts the Division may require' is over-broad and vague. The company has suggested that this requirement should be removed.*

The Division has agreed to this request and the permit has been modified.

15. *The company has requested that, apart from the general permit shield provided in Condition 14 of Section F, subsection (a), the permit also specifically identify Regulations 401 KAR 59:570, 59:575, and 51:017 as being not applicable to this facility.*

The Division has denied this request as the general permit shield coupled with a listing of all applicable regulations at each of the Emission Points implicitly identifies the non-applicability of all other regulations.

16. *GRS has stated that there is no requirement in the regulations that a company must submit a transfer agreement, in the event of such an undertaking, 30 days in advance of the transfer. The company has requested that Condition 2 of Section F, subsection (c) be modified to this effect.*

The Division concurs that the regulations do not require a 30 day advance notice of permit transfer. This condition has been modified to require submittal of a transfer agreement ‘prior to the transfer’.

17. *GRS has pointed out a typographical error in Section F, subsection (d).*

This has been corrected.

18. *The company has requested the deletion of subsections (g) and (h) of Section F. The company claims that since no Risk Management Plan is required for the facility and as Ozone Depleting Substances regulations do not require an operating permit under Title V, that these subsections must be deleted.*

The Division has denied this request since the Title V permit issued under the authority of the Clean Air Act Amendments requires that all applicable requirements be included in the permit. Since the purpose of the Act was to consolidate all the applicable requirements of the source, the Division includes these two requirements as part of the General conditions. The Division would like to clarify that the requirements are only applicable if and when they are required under the regulations cited in the corresponding permit conditions.

Additional changes made to the Permit by the Division:

1. The Division has modified the Specific Control Equipment Operating Conditions for each applicable emission point to clarify the inspection requirements and the frequency of these checks. In addition, the control efficiencies have been listed in the Description section where applicable.

2. The certification requirements to show that the company is in compliance with the permit requirements was modified from 'annually on the permit issuance anniversary date' to 'annually on the permit issuance anniversary date, or more frequently as specified in this permit', in Section E, condition 7. Part f. of this condition was also suitably modified.
3. The completeness date listed in Section A of the permit on the draft permit was different than that on the cover page. The Division has noted the discrepancy and removed the date from Section A. Further the wording on the regulatory provisions on which the permit is based has been updated from 'draft permit' to 'permit'.
4. The Division has determined that Emission Point 06, Heat Soak Billets, does not have any applicable regulations since there are no emissions from this process except those from the gaseous fuels used. As a result, all there are no requirements for this emission point and the permit has been modified to reflect this.